

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRITISH TELECOMMUNICATIONS PLC,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

C. A. No.: 11-1249-LPS

REDACTED -  
PUBLIC VERSION

**BRITISH TELECOMMUNICATIONS PLC'S REQUEST FOR  
ENTRY UPON GOOGLE INC.'S PREMISES FOR INSPECTION**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff British Telecommunications plc ("BT"), through its counsel, serves upon Defendant Google Inc. ("Google") its Request for Entry Upon Premises for Inspection, as follows.

**INSTRUCTIONS**

1. BT specifies 9:00 a.m. on December 17, 2012, or some other date and time mutually agreed to by the parties, as the date and time for inspection of the premises stated below.

2. BT requests that its counsel and expert witness(es) be permitted to attend the inspections and access Google's computer systems as identified below.<sup>1</sup>

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<sup>1</sup> The production and removal of documents and notes resulting from this inspection will be pursuant to a protocol to be discussed and negotiated by the parties.

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REQUEST TO ENTER AND INSPECT

BT requests access to enter and inspect the Google repositories which contain documents produced in Google's September 28, 2012 and October 5, 2012 production of core technical documents, including the following Google Sites:<sup>2</sup>

1. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00008168 resides);
2. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00006888 resides);
3. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00012232 resides);
4. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00123218 resides);
5. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00123219 resides);
6. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00007693 resides);
7. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00022607 resides);
8. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00106981 resides);
9. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00072347 resides);
10. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00009338 resides);
11. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00009603 resides);
12. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00009692 resides);
13. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00009929 resides);
14. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00010004 resides);
15. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00010670 resides);

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<sup>2</sup> This list is not intended to be and cannot be an exhaustive list of internal Google Sites from which documents have been produced, because Google has not yet specifically identified from which internal Google web sites the core technical documents produced by Google on September 28, 2012 and October 5, 2012 were collected. Nor did Google identify internal Google web sites in its Disclosures Pursuant to Paragraph 3 of the District of Delaware Default Standard for Discovery.

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16. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00013676 resides);
17. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00014164 resides);
18. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00014186 resides);
19. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00014226 resides);
20. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_000227043 resides);
21. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00014489 resides);
22. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00119498 resides);
23. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00027072 resides);
24. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00028371 resides);
25. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00011643 resides);
26. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00197108 resides);
27. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00022430 resides);
28. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00008868 resides); and
29. [REDACTED] (the repository where the document bearing Bates No. Goog\_BT\_00014491 resides).

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YOUNG CONAWAY STARGATT & TAYLOR, LLP

*/s/ Robert M. Vrana*

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Dated: November 16, 2012

*Attorneys for British Telecommunications plc*

**CERTIFICATE OF SERVICE**

I, Robert M. Vrana, Esquire, hereby certify that on November 16, 2012, I caused to be electronically filed a true and correct copy of British Telecommunications plc's Request for Entry upon Google Inc.'s Premises for Inspection with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following counsel of record:

Jack B. Blumenfeld (jblumenfeld@mnat.com)  
Paul Saindon (psaindon@mnat.com)  
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I further certify that on November 16, 2012, I caused a copy of the foregoing document to be served on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

**BY E-MAIL (by agreement of counsel):**

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*/s/ Robert M. Vrana*

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Robert M. Vrana (No. 5666)